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12 MARBLE BRIDGE FUNDING GROUP, INC.

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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN JOSE DIVISION**

19 MARBLE BRIDGE FUNDING GROUP, INC.,
20 Plaintiff,
21 vs.
22 NATURE'S OWN PHARMACY, LLC, et al.,
23 Defendants.

24 MARBLE BRIDGE FUNDING GROUP, INC.,
25 Plaintiff,
26 vs.
27 EULER HERMES AMERICAN CREDIT
28 INDEMNITY COMPANY,
Defendant.

EULER HERMES AMERICAN CREDIT
INDEMNITY COMPANY,
Counterclaim Plaintiff,
vs.
NATURE'S OWN PHARMACY, LLC,
RICHARD WALLACE; RICHARD
WALLACE, et al.,
Counterclaim Defendants.

Case Nos.: 5:12-CV-01839-EJD; 5:12-CV-02729-EJD

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
CUT-OFF PER RECOMMENDATION
OF MAGISTRATE JUDGE GREWAL**

1 By this stipulated motion, the undersigned parties request an order extending the
2 discovery cut-off by 90 days from March 28, 2014 to June 26, 2014 with a corresponding
3 extension of the deadline to complete expert discovery. Magistrate Judge Paul S. Grewal, who
4 has been involved with discovery, has recommended that this extension be granted. Good cause
5 exists for the extension. The parties were before Judge Grewal to resolve discovery issues on
6 January 28, 2014. As reported by Euler at the hearing, Euler is in the process of collecting and
7 reviewing approximately 1,000,000 documents, a process estimated to take approximately two
8 months and Marble Bridge will need to review the documents after they are produced. Three
9 depositions have been taken in Florida and the parties are scheduling multiple depositions to be
10 taken in Maryland and San Francisco and possibly elsewhere, some of which will need to be
11 taken or continued upon completion of document production.

12 Magistrate Judge Grewal informed the parties that they have his permission to relay to
13 Judge Davila that a 90 day extension of the discovery deadline is recommended by Judge Grewal.
14 The expert cut-off will also need to be extended by 90 days in accord with the prior schedule.

15 Dated: February 12, 2014

16 BUCHALTER NEMER

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18 By: /s/ Randall Manvitz
19 RANDALL MANVITZ
20 Attorney for Plaintiff and Counter-Claim
Defendant MARBLE BRIDGE FUNDING
GROUP
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1 Dated: February 12, 2014

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13 By: /s/ Neal W. Cohen

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23 Plaintiff EULER HERMES AMERICAN
24 CREDIT INDEMNITY COMPANY now
25 known as EULER HERMES NORTH
26 AMERICA INSURANCE COMPANY

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ORDER

PURSUANT TO MAGISTRATE JUDGE PAUL S. GREWAL'S RECOMMENDATION
AND THE PARTIES' STIPULATION, IT IS ORDERED AS FOLLOWS:

1. The discovery cutoff is extended from the present deadline of March 28, 2014 to June 26, 2014.

2. The expert discovery cut-off is also extended from the present deadline of April 25, 2014 to July 24, 2014.

IT IS SO ORDERED.

Dated: February 14, 2014

Edmund Dashiell

Honorable Edward J. Davila
Judge of the Northern District Court

CERTIFICATE OF SERVICE

I, Denise H. Field, hereby certify that on this 12th day of February 2014, a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent by electronic mail to all counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

A paper copy will be sent, via U.S. Mail, to the following:

Richard Wallace
712 93rd Avenue North
St. Petersburg, FL 33702

0084362 Marsha Holloway
c/o Marion County Jail
700 NW 30th Avenue
Ocala, FL 34475

By: /s/ Denise H. Field